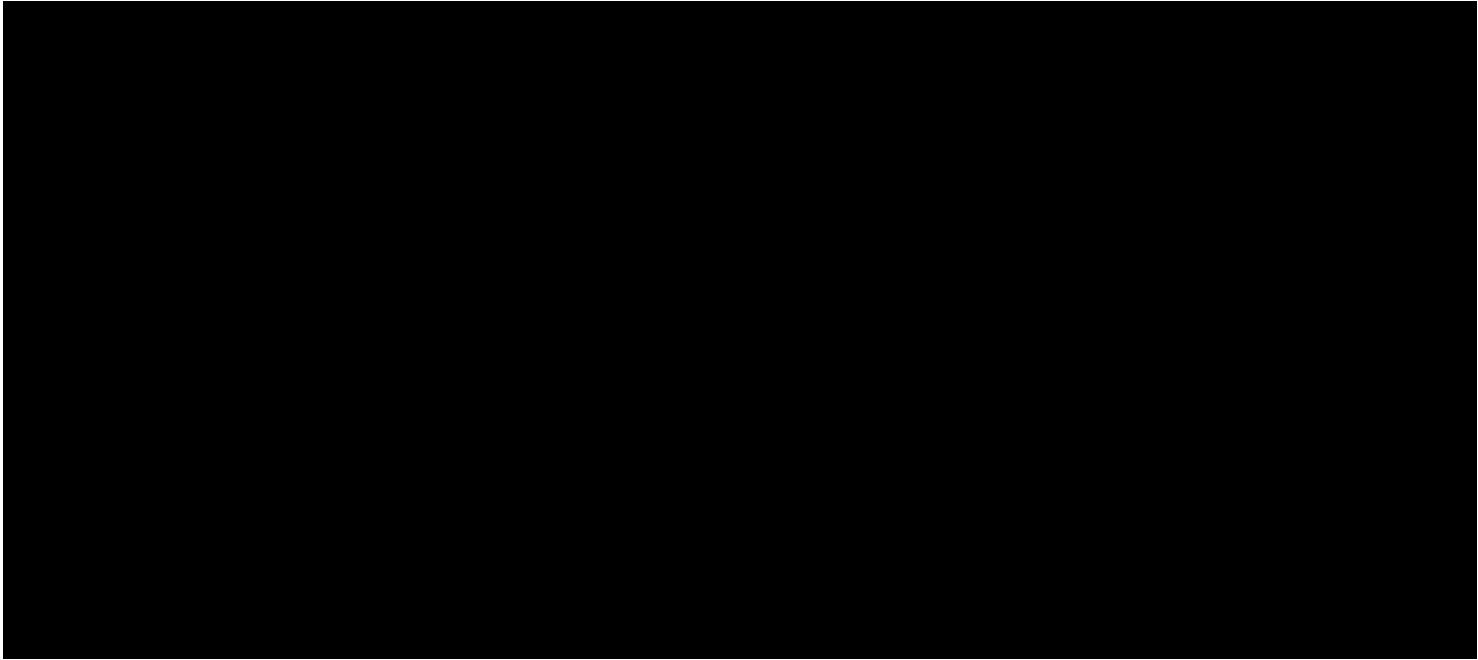


EXHIBIT C



From: Charles Teale <cteale@tealelaw.com>
Sent: Thursday, April 18, 2019 5:16 PM
To: John A. Curran <Curran@gcglaw.com>
Subject: Re: Murphy, Shawn

Hi John,

I had Shawn draw a diagram of the camera placement in the jailhouse. I thought this may help you understand the location of the cameras and the importance of obtaining the footage from them. Please see *attached*.

Although all footage is important and should be preserved (see below), of particular importance is the footage from the camera at the end of the hallway leading to the medical department perched above where Shawn was tased for the second time while restrained. Shawn marked the camera on the diagram with the wording "This View Is Important!"

I would like to view all footage from all cameras marked on the diagram.

Lastly, I am also troubled that after the first time Shawn was tackled, pepper-sprayed, and tased, he informed the guards that there was something wrong with his leg, he can clearly be seen limping in the video you have provided, yet he was forced to continue walking on his leg. He informs that during the course of the second tasing he heard a "pop" sound in his leg. At that point he reports that he was carried by guards. The failure or refusal to transport him in a wheel chair or on a stretcher may have caused new injuries or exacerbated the initial injury.

The failure to preserve and retain electronic data as outlined in this notice constitutes spoliation of evidence and will subject your client to legal claims for damages and/or evidentiary and monetary sanctions. Preservation is to be interpreted broadly to maintain the integrity of all documents, data, and tangible things reasonably anticipated to be subject to discovery under Fed. R. Civ. P. 26, 45, and 56(e) in this action. Preservation includes taking reasonable steps to prevent the partial or full destruction, alteration, testing,

deletion, shredding, incineration, wiping, relocation, migration, theft, or mutation of such material, as well as negligent or intentional handling that would make material incomplete or inaccessible.

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From: Charles Teale
Sent: Monday, April 15, 2019 2:49:31 PM
To: John A. Curran
Subject: Re: Murphy, Shawn

No. It is possible that they are using another manufacturer's electroshock device. Taser happens to be the most used brand however. I can't imagine another manufacturer would put out a manual that states it's ok to shock subjects while they are restrained. Regardless, the case law is pretty clear that executing an electroshock on a cuffed subject is excessive force.

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From: John A. Curran <Curran@gcglaw.com>
Sent: Monday, April 15, 2019 2:27:24 PM
To: Charles Teale
Subject: RE: Murphy, Shawn

Provided to Strafford County? John

John A. Curran, Esq.
Dir: 603.545.3656
Gen: 603.228.1181
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Email: curran@gcglaw.com

From: Charles Teale <cteale@tealelaw.com>
Sent: Monday, April 15, 2019 2:18 PM
To: John A. Curran <Curran@gcglaw.com>
Subject: Re: Murphy, Shawn

The manual is from the manufacturer.

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From: John A. Curran <Curran@gcglaw.com>
Sent: Monday, April 15, 2019 2:15:46 PM
To: Charles Teale
Subject: RE: Murphy, Shawn

Charles: I will inquire relative to your questions; what and where is this "taser manual" from? Thx John

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From: Charles Teale <cteale@tealelaw.com>
Sent: Monday, April 15, 2019 1:16 PM
To: John A. Curran <Curran@gcglaw.com>
Subject: Re: Murphy, Shawn

Hi John,

I spoke to my client. He informs that there are multiple other cameras in the facility that would have captured the incident.

Additionally, he reports that an officer used a Taser on him *after* he was handcuffed. That is absolute excessive force and strictly prohibited in the officer's training and in the Taser manual. See *attached*. I have had this exact issue with other departments in the State and have always fared well.

Any luck on the incident reports or additional video surveillance footage?

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From: Charles Teale
Sent: Friday, April 12, 2019 10:14:09 AM
To: John A. Curran
Subject: Re: Murphy, Shawn

I would assume for security reasons the facility would have significantly more cameras running. It's 2019. They're cheap. Of course, I know nothing of their security protocol.

It's hard to see that they are trying to force him back into his cell. That's my understanding too, but it doesn't even look like he gets close to a cell door.

Good luck in the depositions today. Talk soon...

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From: John A. Curran <curran@gcglaw.com>
Sent: Friday, April 12, 2019 9:20 AM
To: Charles Teale
Subject: RE: Murphy, Shawn

4/12/19

Charles: My understanding is that this is the only video coverage/camera for that area, but I will call and confirm (and advise you accordingly). I will also inquire on reports you note, but my understanding is that Mr. Murphy was upset about something, refused to go to his cell, was escorted back to his cell but when they were trying to lock his cell, he began pushing the door back open, came out of the cell and in the ensuing struggle, one of the officers fell onto him (and his leg); again, this is my understanding, but will inquire further. I believe the video catches it, but it's admittedly not clear, nor a good angle. Talk soon (fyi: am in depositions a good part of today, so may be next week), thx JOHN

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From: Charles Teale <cteale@tealelaw.com>
Sent: Thursday, April 11, 2019 12:52 PM
To: John A. Curran <Curran@gcglaw.com>
Subject: Re: Murphy, Shawn

Hi John,

My assistant was able to pull the video up. It's a bit difficult to see the details of what occurred. Is there any video surveillance footage from the lower level area that the incident took place in? Is there any other footage that may be relevant?

Is there an incident report or use of force report or the like?

I'm keenly interested in how my client's leg was broken in this ordeal. The video doesn't seem to tell the tale...

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From: John A. Curran <Curran@gcglaw.com>
Sent: Friday, April 5, 2019 1:19:28 PM
To: Charles Teale
Subject: RE: Murphy, Shawn

Great, that's a plan, thx Charles, JOHN

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From: Charles Teale <cteale@tealelaw.com>
Sent: Friday, April 5, 2019 1:15 PM
To: John A. Curran <Curran@gcglaw.com>
Subject: Re: Murphy, Shawn

That works for me. I'm pretty loose next week and never have dad duty, so I can accomodate. :)

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From: John A. Curran <Curran@gcglaw.com>
Sent: Friday, April 5, 2019 1:04:09 PM
To: Charles Teale
Subject: RE: Murphy, Shawn

As long as I don't have Soccer Dad duty that night, should work; let's trade email on Tues to pick a time.....make sense? JOHN

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From: Charles Teale <cteale@tealelaw.com>
Sent: Friday, April 5, 2019 12:24 PM
To: John A. Curran <Curran@gcglaw.com>
Subject: Re: Murphy, Shawn

How about Tuesday evening at my office on your pass through? What time?

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From: John A. Curran <Curran@gcglaw.com>
Sent: Friday, April 5, 2019 12:12:17 PM
To: Charles Teale
Subject: RE: Murphy, Shawn

I have depositions on Thurs and Friday, so mon, tues or weds most likely. I have a big client in Manch and pass through there on my commute, so time and which day is flexible, thx JOHN

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Email: curran@gcglaw.com

From: Charles Teale <cteale@tealelaw.com>

Sent: Friday, April 5, 2019 12:08 PM

To: John A. Curran <Curran@gcglaw.com>

Subject: Re: Murphy, Shawn

Sure. My court schedule is pretty light next week. What day, time and location were you thinking?

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From: John A. Curran <curran@gcglaw.com>

Sent: Friday, April 5, 2019 11:36 AM

To: Charles Teale

Subject: Murphy, Shawn

4/5/19: Charles: I just rec'd copy of the video footage in the mail from SCDOC; do you want to try and coordinate a date/time next week when we can meet and I can deliver this to you? Thx JOHN

John A. Curran, Esq.

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Shawn Jail
Diagram.pdf